

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Case No. 22-31641-mv-7
GOODMAN NETWORKS, INC.	§	
	§	(Chapter 7)
Debtor.	§	
	§	
SCOTT M. SIEDEL, TRUSTEE	§	
	§	
Plaintiff,	§	ADVERSARY PROCEEDING
	§	NO: 23-03090-mvl
v.	§	
	§	
HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, ALLIANCE TEXAS	§	
HOLDINGS, LLC; NEIL Z. AUERBACH,	§	
JUDITH AUERBACH, AUERBACH	§	
PARTNERS, L.P, JAMES GOODMAN,	§	
JAMES FRINZI, GOODMAN	§	
INVESTMENT HOLDINGS, LLC,	§	
GENESIS NETWORKS, INC., GENESIS	§	
NETWORKS GLOBAL SERVICES, LLC,	§	
AUERBACH CHILDREN’S DYNASTY	§	
TRUST U/A/D OCTOBER 9, 2012, and	§	
AUERBACH FAMILY DYNASTY TRUST	§	
U/A/D OCTOBER 9, 2012,	§	
	§	
Defendant(s).	§	

UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD

Wick Phillips Gould & Martin, LLP (“WPGM”) files this Unopposed Motion to Withdraw as Counsel (the “Motion”) for Defendant James Frinzi (“Mr. Frinzi”).

1. WPGM seeks to withdraw from representing Mr. Frinzi in this case. WPGM is owed substantial fees and expenses under its engagement letter.

2. Pursuant to Local Bankruptcy Rule 2091-1, Mr. Frinzi agrees to WPGM's withdrawal and executed this Motion below. Mr. Frinzi has not retained successor counsel and his contact information is as follows:

- a. Name: Mr. James Frinzi
 - b. Address: 3736 Bee Cave Road, Suite 1164 Austin, Texas 78746
 - c. Telephone Number: (202) 430-4500
3. This request to withdraw is not made for purposes of delay.

WHEREFORE, WPGM respectfully requests this Court to (i) grant the Motion, (ii) enter the proposed order attached as **Exhibit A** to permit WPGM to withdraw as counsel to Mr. Frinzi, (iii) and grant WPGM such other and further relief to which it may be justly entitled, both at law and equity.

Executed: _____

James Frinzi

Dated: April 23, 2024

Respectfully submitted,

/s/ Jason M. Rudd

Jason M. Rudd, Tex. Bar No. 24028786

Paul T. Elkins, Tex. Bar No. 24092383

WICK PHILLIPS GOULD & MARTIN, LLP

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**COUNSEL FOR DEFENDANT JAMES
FRINZI**

CERTIFICATE OF CONFERENCE

Local Bankruptcy Rule 7007-1, I hereby certify that on April 18, 2024, I conferred by phone with Davor Rukavina, Counsel for Scott Seidel, Chapter 7 Trustee and Plaintiff. The Trustee does not oppose this Motion.

/s/ Jason M. Rudd

Jason M. Rudd

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2024, I electronically filed the foregoing with the clerk of the court using the CM/ECF system and have served a copy of the same to the following parties or their counsel via the method(s) indicated below:

Davor Rukavina Thomas D. Berghman MUNSCH HARDT KOPF & HARR, P.C. 3800 Ross Tower 500 N. Akard Street Dallas, TX 75201	_____ _____ _____ _____ _____ <u> X </u>	Hand Delivery Regular Mail Facsimile E-mail CM/ECF
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**Counsel for the Scott Seidel,
Chapter 7 Trustee**

James Frinzi 3736 Bee Cave Road, Suite 1164 Austin, Texas 78746 James@frinzi.net	_____ <u> X </u> _____ <u> X </u> _____	Hand Delivery Regular Mail Facsimile E-mail CM/ECF
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/s/ Jason M. Rudd

Jason M. Rudd

EXHIBIT A
Proposed Order

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PARTNERS, L.P, JAMES GOODMAN,	§	
JAMES FRINZI, GOODMAN	§	
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AUERBACH FAMILY DYNASTY TRUST	§	
U/A/D OCTOBER 9, 2012,	§	
	§	
Defendant(s).	§	

ORDER GRANTING UNOPPOSED MOTION TO WITHDRAW AS COUNSEL OF RECORD

Came on consideration the Unopposed Motion to Withdraw as Counsel, filed by Wick Phillips Gould & Martin, LLP ("WPGM"), in the above-captioned case. The Court finds that proper notice of the Motion has been provided and good cause exists to permit WPGM to withdraw as counsel for Defendant James Frinzi ("Mr. Frinzi"). Therefore, it is hereby:

ORDERED that the Motion is GRANTED; it is further

ORDERED that the Clerk of this Court and all parties are directed to remove WPGM as counsel for Mr. Frinzi on the docket and any applicable service list, including the Court's CM/ECF electronic notification list, maintained in the Bankruptcy Case.

ORDERED Mr. Frinzi may be contacted as follows: 3736 Bee Cave Road, Suite 1164 Austin, Texas 78746, James@frinzi.net.

END OF ORDER

PREPARED AND SUBMITTED BY:

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